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March 26, 2019

VIA ECF

Honorable Nicholas G. Garaufis
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *United States v. Ranieri, et al.*, 18-cr-204 (NGG) (VMS)

Dear Judge Garaufis:

I write on behalf of my client Clare Bronfman to respectfully request that the Court postpone the evidentiary hearing regarding the documents seized from Ms. Bronfman's storage unit, which was scheduled last night for tomorrow afternoon, March 27, until a date next week convenient for the Court. In light of the *Curcio* hearing the Court has already scheduled for tomorrow afternoon, counsel for Ms. Bronfman requests the brief adjournment of the evidentiary hearing in order to allow time to focus today and tomorrow on conferring with Ms. Bronfman regarding the *Curcio* issues that will be addressed at the conference tomorrow, and to allow additional time to prepare for an evidentiary hearing on the storage unit documents at which Ms. Bronfman may testify.

In addition, after conferring with AUSAs Penza and Hajjar today, both parties believe that there may be an opportunity to narrow the issues or the scope of the documents to be addressed at the hearing through further discussions. Accordingly, the government joins in defendant's request to adjourn the evidentiary hearing until next week.

Respectfully submitted,

/s/

Kathleen E. Cassidy

cc: AUSAs Moira Kim Penza, Tanya Hajjar, Mark Lesko (via ECF)
All defense counsel (via ECF)